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September 7, 2022

BY ECF

Honorable James R. Cho
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Brigid Pierce v. City of New York, et al.* 21-CV-3482 (PKC)(JRC)

Your Honor:

This firm represents Plaintiff Brigid Pierce in the above-captioned case. We write to request an extension of the deadline for Plaintiff to complete expert disclosures from September 9, 2022 to September 30, 2022. This extension is necessary because Plaintiff still has yet to receive the results from some of the neurological examinations she underwent in July, which are necessary for Plaintiff's expert evaluations. Defendants consent to this request.

As explained in Plaintiff's previous request for an extension of the expert disclosure deadline, Plaintiff underwent three neurological examinations, prescribed by her neurological expert, to assess the extent of her injuries in July. To date, Plaintiff still has not received results for one of the three examinations and is waiting to receive the raw data from another. Since her previous extension request, Plaintiff renewed her request to the hospital for this information, but she has yet to receive it. Plaintiff's expert cannot complete his report without both of these results.

Plaintiff therefore respectfully requests that the Court grant an extension of the deadline for Plaintiff's expert disclosures until September 30, 2022. This is Plaintiff's third request for an extension of this deadline. Plaintiff's second request, to extend the deadline from August 15 to September 9, was granted on August 15. Should the Court grant this extension, the parties also request that the deadline for the parties' joint status letter, currently set for September 16, 2022, be

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adjourned until after Plaintiff's expert disclosure deadline.

Sincerely

/s/

Ilann M. Maazel
Max Selver

c. All counsel (by ECF)